

**REMARKS/ARGUMENTS**

Claims 1, 3-6, 8-16, and 18-23 are pending in this application. By this Amendment, the specification and claims 6, 8-12, and 22-23 are amended.

**OBJECTION TO THE SPECIFICATION**

In section 2 on page 2, the Office Action objects to the specification for allegedly failing to provide proper antecedent basis for the claimed subject matter, specifically alleging that the specification does not disclose a computer readable medium. While we respectfully disagree with this objection, we have proposed an amendment to the specification in order to more explicitly describe the computer-readable storage medium.

As stated in M.P.E.P. § 2163.07(a),

By disclosing in a patent application a device that inherently performs a function or has a property, operates according to a theory or has an advantage, a patent application necessarily discloses that function, theory or advantage, even though it says nothing explicit concerning it. The application may later be amended to recite the function, theory or advantage without introducing prohibited new matter. (emphasis added).

As described by the specification, the systems described as displaying the GUI inherently contain some computer-readable storage medium. In paragraphs [0004] and [0007] of the published application, the GUI is described as being generated and displayed by a network management system (NMS), specifically citing the Alcatel 5620 NM as one possible example of an NMS for generating and displaying the described GUI. Any NMS, including the Alcatel 5620 NM, must include some

computer-readable storage medium in order to store both instructions for execution and data for manipulation and display. Such a computer-readable storage medium will include at least one of read-only memory (ROM), random-access memory (RAM), magnetic disk storage media, optical storage media, flash-memory devices, and similar storage media.

Further, many components of the modified GUI are described as gathering or storing some form of data, which would necessarily include storing the data in a computer-readable storage medium. For example, paragraph [0030] describes the outside link locator 42 as preparing a connections list, L(n), which may then be used by MLC generator unit 44 to create the multiple link connector object. In order for any data construct, such as a list, to exist for the use of an NMS and components thereof, it must be stored in a computer-readable storage medium of some kind. Otherwise, the connections list, L(n), would immediately cease to be upon creation, and thus be of no use to MLC generator unit 44.

Thus, because the specification inherently includes a computer-readable storage medium for storing instructions and data, the specification necessarily discloses such subject matter and the proposed amendment to the specification does not constitute impermissible new material. Accordingly, applicant respectfully requests a withdrawal of the objection to the specification.

**CLAIM REJECTIONS UNDER 35 U.S.C. § 101**

In sections 3-4 on pages 2-3, the Office Action rejects claims 6, 8-12, and 22 under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. The Office Action states that claim 6 appears to be directed to software *per se*. While applicant respectfully disagrees with this basis for rejection, in the interest of furthering prosecution, claims 6, 8-12, and 22 have been amended to recite a Network Management System (NMS) and “an interface that connects the NMS to a network device to be displayed on the map of interest.”

These amendments find support in, *inter alia*, paragraphs [0004], [0007], and [0029] of the published application. Specifically, paragraph [0029] states, “all nodes maintain an object library that comprises data pertinent to the network elements at the respective node, available for use by various network management applications, including the GUI” (emphasis added). Accordingly, the specification necessarily discloses an NMS having an interface capable of communication with a number of network elements, such that the object libraries stored thereby may be used by the NMS displaying the GUI.

Applicant respectfully submits that claims 6, 8-12, and 22 are directed to a particular machine and thus constitute statutory subject matter. Accordingly, Applicant respectfully requests that the rejection of claims 6, 8-12, and 22 under 35 U.S.C. § 101 be withdrawn.

**CLAIM REJECTIONS UNDER 35 U.S.C. § 102**

In section 6 on pages 3-13, the Office Action rejects claims 1, 3-6, 8-16, and 18-23 under 35 U.S.C. § 102 as allegedly being anticipated by U.S. Patent Number 7,315,985 to Gauvin et al. (hereinafter, "Gauvin"). Applicant respectfully traverses this rejection.

Independent claim 1 recites, "[a] method of displaying all direct connections between a subject node and outside nodes not displayed on a map" and "bundling, for each of said plurality of outside node groups, said direct connections between said subject node and said outside nodes belonging to said outside node group to create an outside link bundle[.]" Independent claims 6 and 13 contain similar recitations. Independent claim 16 contains the similar recitation, "a comprehensive network map illustrating all outside link bundles to a plurality of network devices external to said map[.]"

On page 4, the Office Action cites Gauvin as allegedly teaching the above-quoted subject matter through its teaching that elements in a network topology map may be grouped together and that elements have a parent-child relationship. Gauvin generally teaches a topology map having three major portions: a host display area, a network display area, and a storage display area. *Gauvin, Column 11, Lines 61-65*. Connection elements are displayed in the connection area of the map and illustrate the connections between host devices in the host display area

and storage devices in the storage display area. *Id.*, Column 17, Line 62- Column 18, Line 4.

Gauvin does not teach, however, that a connection element may be used to represent a connection to elements other than those already displayed on the map. Thus, Gauvin fails to teach “bundling . . . said direct connections between said subject node and said outside nodes . . .” (emphasis added) where an outside node is a node not displayed on the map.

Independent claim 1 further recites, “displaying, responsive to selecting said interactive connector icon, a pop-up window showing a multiple link connector (MLC) list wherein each item in said MLC list represents an outside link bundle and a corresponding outside node group, the outside link bundle comprising one or more direct connections.” Independent claims 6, 13, and 16 contain similar recitations.

On page 4, the Office Action cites columns 26 and 28 as allegedly disclosing this subject matter. Specifically, the Office Action points out that Gauvin discloses “displaying a group view control mechanism in response to selecting a group expansion mechanism” and that “[t]he group view control mechanism provides different levels of group expansion for selection.”

Gauvin teaches that upon selection of a group expansion mechanism, a group view control mechanism is displayed as a pull-down menu. *Gauvin, Column 26, Lines 29-41*. “Each choice in the menu corresponds to a different level or layer of group expansion.” *Id., Column 26, Lines 47-48*. Thus, while Gauvin technically displays a list, the list does not refer to separate link bundles but, instead, is a hierarchy trail of each group the same displayed connections belong to. For example, in FIG. 10, the group view control 220 displays that the currently displayed connections 205-6, 205-7 belong to both the Test User Group and Sub Group 1. Note that Sub Group 2, indicated at reference character 165 as another member of Test User Group at the same level as Sub Group 1, is not listed in group view control 220.

Further, even assuming *arguendo* that one of the elements of the group view control mechanism may be characterized as representing a group of connections, none of the elements can be said to also represent a device corresponding to the connection. As explained above, and as FIG. 10 clearly shows, the host node 171-2 and storage node 191-4 at each end of a connection are displayed. The device or group corresponding to the connection is therefore already represented on the map and is thus not an outside node group. The drop down list also includes no indication as to which device a group is connected. Thus, Gauvin fails to disclose

“wherein each item in said MLC list represents an outside link bundle and a corresponding outside node group” (emphasis added).

Claims 3-5 and 21 depend from allowable claim 1; claims 8-12 and 22 depend from allowable claim 6; claims 14-15 and 23 depend from allowable claim 13; and claims 18-20 depend from allowable claim 16. Thus, claims 3-5, 8-12, 14-15, and 18-23 are allowable based, at least, on their respective dependencies. Accordingly, Applicant respectfully requests that the rejection of claims 1, 3-6, 8-16, and 18-23 under 35 U.S.C. § 102 be withdrawn.

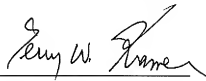
#### CONCLUSION

While we believe that the instant amendment places the application in condition for allowance, should the Examiner have any further comments or suggestions, it is respectfully requested that the Examiner telephone the undersigned attorney in order to expeditiously resolve any outstanding issues.

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Kramer & Amado's Docket No: ALC 3130

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Respectfully submitted,  
**KRAMER & AMADO, P.C.**

A handwritten signature in black ink, appearing to read "Terry W. Kramer", written over a horizontal line.

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